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PLEASE REPLY TO ROSELAND, NJ

September 26, 2012

VIA ECF AND FAX

Hon. Madeline Cox Arleo, U.S.M.J.
King Building & U.S. Courthouse
50 Walnut St., P.O. Box 999
Newark, NJ 07101-0999

Re: *Montvale Surgical Center a/s/o Thomas S. v. Aetna Ins. Co. et al.*,
Civ. No. 12-2874 (SDW/MCA)

Dear Judge Arleo:

This firm represents Aetna Health Inc. (improperly pled as "Aetna Insurance Company") (hereinafter "Aetna") in the above-referenced matter. On July 16, 2012, Your Honor entered an Order in this case that established summary judgment filing deadlines, with cross-motions to be filed by October 15, 2012; any opposition by November 15, 2012; and any reply by December 7, 2012. (Doc. No. 5).

With the consent of Plaintiff Montvale Surgical Center, Aetna respectfully requests a 90-day adjournment of the foregoing filing deadlines related to the parties' anticipated cross-motions for summary judgment. This 90-day consent adjournment is requested in view of this firm's entry into this case in August, 2012, and overlapping deadlines we have in other matters. We are seeking 90 days so that the deadlines fall beyond the forthcoming holiday season. The requested new dates sought with consent are: January 15, 2013 for cross-motions to be filed; February 15, 2013 for any opposition to be filed; and March 8, 2013 for the filing of reply.

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As always, we are available to answer any questions Your Honor or Your Honor's staff may have on this matter. If this request meets with Your Honor's approval, for convenience, a "So Ordered" signature line is included *infra*.


Respectfully submitted,

s/ Patrick J. Murphy, III

Patrick J. Murphy, III

Cc: Andrew Bronsnick, Esq. (Via CM/ECF and Email)

IT IS SO ORDERED this 26 of September, 2012, that cross-motions for summary judgment shall be filed by January 15, 2013; opposition by February 15, 2013; and reply brief by March 8, 2013.


HON. MADELINE COX ARLEO, U.S.M.J.